

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF FLORIDA

TAMPA DIVISION

CASE NO.: 8:22-cv-00511-CEH-TGW

SAMANTHA M. MARKLE,

Plaintiff,

v.

MEGHAN MARKLE,

Defendant.

/

THIRD AMENDED COMPLAINT FOR DAMAGES

The Plaintiff, SAMANTHA M. MARKLE (hereinafter referred to as “SAMANTHA”), by and through her undersigned counsel, hereby serves her Third Amended Complaint for Damages against the Defendant, MEGHAN MARKLE (hereinafter referred to as “MEGHAN”), and alleges as follows:

Jurisdiction and Venue

1. This Court has jurisdiction pursuant to 28 U.S.C. 1332, as there is diversity and the damages sought are in excess of \$75,000 exclusive of interest, costs, and attorneys' fees.
2. Venue is proper in that the cause of action occurred in the Middle District of Florida.

The Parties

3. SAMANTHA is a private citizen who is *sui juris* and is a citizen of Florida.

4. MEGHAN is a private American citizen who is *sui juris* and is a citizen of California. She is subject to personal jurisdiction in the State of Florida pursuant to Fla. Stat. § 48.193(1)(a)(2), as she has committed intentional tortious acts within the State of Florida.

Prefatory Statement

5. MEGHAN is an American actress who achieved success and fame in her own right. However, as fate had it, she met and ultimately married Prince Harry, grandson of Queen Elizabeth of the British Empire and second son of King Charles III.

6. For reasons of her own, MEGHAN distanced herself and denied familiarity or closeness to her family, including SAMANTHA, who is MEGHAN's half-sister on their father's side.

7. During their childhood, MEGHAN was very close to her older sister despite their 17-year difference in age. SAMANTHA was more than a model to follow, she was also someone who regularly went with Thomas Markle as he drove MEGHAN to and from school and acting classes. Among many other things, SAMANTHA helped MEGHAN with homework, took her on shopping trips to the local mall, and overall had a good to wonderful relationship with her younger sister.

8. Once MEGHAN started to have success as an actress, she no longer had time for her older sister, SAMANTHA, and by 2016, the two had stopped visiting, though there were no bad feelings between them, as far as SAMANTHA knew.

9. Unfortunately, once MEGHAN met and began dating Prince Harry MEGHAN became hostile to SAMANTHA, as well as her half-brother and her father, and MEGHAN's relationship with SAMANTHA became estranged.

10. The first sign of MEGHAN's hostility toward SAMANTHA was in 2017, the year when MEGHAN announced her engagement to Prince Harry. Prior to their engagement, SAMANTHA phoned her sister, MEGHAN, from time to time to talk and catch up with MEGHAN. The defining moment highlighting MEGHAN's unwarranted hostility toward SAMANTHA occurred when SAMANTHA called MEGHAN while MEGHAN was on break from work at her home in Canada with her mother. When SAMANTHA called MEGHAN, MEGHAN hung up the phone immediately upon hearing SAMANTHA's voice. That was strange as it had never happened before and so SAMANTHA called back right away and left a message. To this day MEGHAN has never returned SAMANTHA's phone call.

11. Following that surprising response to SAMANTHA's phone call, and continuing to the present, MEGHAN has belligerently attempted to malign SAMANTHA as well as other family members, as it is MEGHAN's method to terminate friendships, rather than save them, and for her to become hostile.

12. On May 19, 2018, MEGHAN married Prince Harry at St. George's Chapel at Windsor Castle in the United Kingdom. Out of MEGHAN's entire immediate and extended family, only her mother, Doria Ragland, was formally invited to the wedding.

13. MEGHAN verbally invited Thomas Markle, the father of SAMANTHA and MEGHAN, only to disinvite him shortly before the wedding.

14. Prior to the wedding, Thomas Markle suffered two heart attacks, and for obvious medical reasons was not able to attend. MEGHAN knew of his medical condition, and instead of showing grace and compassion, she effectively terminated her relationship with her father because she believed that he had attempted to gain publicity due to MEGHAN's engagement.

15. Around that time, the media discovered SAMANTHA and began contacting her for interviews. SAMANTHA accepted the requests for interviews and made glowing and positive statements about her sister, MEGHAN, and her upcoming wedding.

16. During an interview, one of SAMANTHA's statements was taken out of context and misconstrued. SAMANTHA revealed that MEGHAN had not yet contacted her father, despite knowing that Thomas Markle recently suffered two heart attacks.

17. SAMANTHA's misconstrued statement was apparently the tipping point of MEGHAN's relationship with SAMANTHA. After the interview with SAMANTHA, the press released numerous "stories" about how SAMANTHA "bashed" MEGHAN, when SAMANTHA had simply expressed concern for both her father and her sister, MEGHAN. However, once the issue was out, in the public, MEGHAN became a relentless foe to her sister.

18. It was after the interview of SAMANTHA that MEGHAN, started her smear campaign and ongoing deluge of distorted facts and stories, complete with fake quotes about and "by" SAMANTHA.

19. MEGHAN harbored resentment due to what she perceived to have been SAMANTHA's intentional statement, and the follow-up by the press. She responded to

the fake quotes publicly through various media outlets. MEGHAN has never reached out to SAMANTHA directly to discuss these matters, nor had MEGHAN taken any steps to correct the lies which had been continuously spread about SAMANTHA.

20. MEGHAN knows and has known, at all relevant times that her older sister, SAMANTHA suffers from Muscular Sclerosis, a debilitating disease exacerbated by stress. Nevertheless, she has not only made public statements vilifying and embarrassing SAMANTHA, but she has encouraged hatred of SAMANTHA through a bot network which has caused great harm to SAMANTHA.

Factual Background

21. In September 2020, MEGHAN and her now husband, Prince Harry, signed a multi-year contract with Netflix for \$135 million.

22. In October 2020, MEGHAN and her husband, Prince Harry, started their joint media production project Archewell Productions, a self-controlled media production company.

Oprah Prime Time Show

23. On March 7, 2021, MEGHAN and Prince Harry appeared on an Oprah Winfrey prime time special. Approximately fifty (50) million people worldwide viewed this program (hereinafter referred to as the “Interview”).

24. During the Interview, MEGHAN made four (4) disparaging, hurtful and false statements insinuating that SAMANTHA is a stranger, a liar, and a person who was only a deceptive fame-seeking imposter with avaricious intentions toward MEGHAN.

25. To publicly refer to one’s own flesh and blood as a stranger and attack the

veracity of SAMANTHA's recently written and released book was more than giving her opinion, the false statements insinuated that SAMANTHA has concocted a fictitious story to reap some inappropriate reward from MEGHAN's fame.

26. In the Interview, the interviewer asked MEGHAN about SAMANTHA and SAMANTHA's book. In direct response to the question, MEGHAN stated:

I think it [sic] be very hard to tell all when you don't know me. . . When you talk about betrayal, betrayal comes from someone that you have a relationship with. Right? I don't feel comfortable talking about people that I really don't know." [Interview 00:03:36.]

27. Yet, MEGHAN's supposed discomfort did not stop her from making three (3) additional false and damaging statements in the Interview about Samantha.

28. MEGHAN stated, "I grew up as an only child" which "as everyone who grew up around me knows, and I wished I had siblings." [Interview 00:03:36.] Although taken as an isolated statement, one could misinterpret the 'only child' statement as a statement of how MEGHAN felt. However, when put in context of the other statements about SAMANTHA, this statement was a denial that SAMANTHA played a part in her life and her upbringing.

29. As such, the statement impugned the character of SAMANTHA by making SAMANTHA appear to be a liar for profit and fame. This was especially true because SAMANTHA had written a book which expressed the truth of their relationship. The statement by MEGHAN set up the oft-spoken and oft-implied false accusation that SAMANTHA is a liar who is fabricating stories about MEGHAN so that SAMANTHA

could become rich and famous off of MEGHAN's marriage to Prince Harry.

30. Using reductive logic, MEGHAN then degraded their relationship to the "physical form" only, stating "the last time I saw her must have been at least 18, 19 years ago, and before that, ten (10) years before that." [Interview 00:04:19.] This was a false statement of fact, not an opinion, which, again, implied that SAMANTHA was a liar and fame-seeker, because it ignored the multitude of phone conversations MEGHAN and SAMANTHA had enjoyed throughout the years. Those phone calls went both-ways and MEGHAN often called SAMANTHA for sisterly advice. Those calls happened periodically throughout their pre-Prince Harry lives.

31. As a follow up question about the relationship between SAMANTHA and MEGHAN the Interviewer asked: "So you all weren't close. You didn't grow up together." [Interview 00:04:22.] That question gave MEGHAN the opportunity to state in a damaging and hurtful response: "No." Again, MEGHAN attacked SAMANTHA's veracity calling into question on a world stage, SAMANTHA's own fond memories of the times spent together when they were both younger, with their father, Thomas Markle, in his home, where she was living at that time.

32. The final defamatory statement MEGHAN made during the Interview was that SAMANTHA changed her surname back to "Markle" when MEGHAN started dating Prince Harry. That statement was false and harmful because it was not the time that SAMANTHA began to use the name "Markle." By making that false statement as to the timing that SAMANTHA started to use her maiden name, MEGHAN created an accusatory

air of mendacity ignoring the multitude of reasons a person, like SAMANTHA, may change their name and when and why, in fact, SAMANTHA changed her name.

33. The statement, “she changed her last name back to Markle... only when I started dating Harry. And so, *I think that says enough*” (Emphasis added.) [Interview 00:05:00.] inferred that SAMANTHA was nefariously using MEGHAN’s last name to cash-in on her sister’s fame. The statement was not true.

34. In fact, SAMANTHA legally changed her name back to Markle in July of 2022, five years after MEGHAN started to date Harry, and after her relationship with MEGHAN fell apart. Of greater significance, SAMANTHA has used her family name Markle interchangeably all of life.

35. It is of importance that, rather than interpreting each word said, or each false set of words, it is important to look at the whole effect, of all that was said in the interview, together. According to MEGHAN, she was betrayed by SAMANTHA, who MEGHAN claimed that she really did not know. MEGHAN always wanted a brother or sister, and the implication, if not the specific statement was that SAMANTHA was someone who MEGHAN did not know well enough to comment. The context of these statements by MEGHAN was that SAMANTHA was falsely portraying that she was MEGHAN's sister; all so that SAMANTHA could gain wealth and fame pretending that she was MEGHAN's true sister. SAMANTHA was being impliedly accused of being a charlatan.

36. MEGHAN used her station and access to popular platforms to direct her hurtful, malicious, and untrue words toward tens of millions of people worldwide.

37. None of MEGHAN's above statements were true, nor were they the mere opinion of an individual. They are statements used as a weapon to discredit and injure the reputation and pecuniary interests of SAMANTHA.

38. The statements made in the Interview are injurious and defamatory and harmed and continue to harm SAMANTHA, emotionally, physically, and monetarily and have caused hatred and threats against SAMANTHA.

Netflix Documentary Series

39. On December 8, 2022, Netflix aired the first part of a 6-part mini-series entitled *Harry & Meghan* (hereinafter referred to as the "Series") on its streaming platform.

40. The Series was a joint effort between MEGHAN's production company Archewell Productions and Blackwell & Ruth. The Series was filmed, edited, and produced for Netflix under the direction of MEGHAN and Prince Harry.

41. According to CBS news, just 6 days after its release, the Series had received twenty-eight million views by December 14, 2022. The series became the most-watched subscription TV show of the year.

42. The Series contains six episodes, and each episode has a runtime of almost 54 minutes and entails a collection of interviews with: MEGHAN, Prince Harry, and a very select, hand-picked, group of their friends, family, and interested and participatory parties.

43. During the 323 minutes of running time the only members of MEGHAN's entire family that are interviewed are MEGHAN's mother, Doria Ragland, and MEGHAN's niece, SAMANTHA's daughter, Ashleigh Hale.

44. MEGHAN used the Series as a platform to publish, promulgate and distribute on a worldwide level malicious, hurtful, and damaging lies many of which were directed at SAMANTHA.

45. The Six-Part mini-docuseries mentioned SAMANTHA, either directly or indirectly, in four (4) of the six (6) episodes.

46. In the Series, there are numerous isolated statements made about SAMANTHA. As this Series was produced and edited by Archewell Productions, all the statements were ultimately approved by and published by MEGHAN. MEGHAN published these statements.

47. The Series is disparaging and hurtful on its own; and the statements when taken individually or collectively, weave a narrative of lies that MEGHAN hides behind in an attempt to bolster her own false “rags-to-riches” while actually discrediting her sister calling her a liar and “fame seeker,” and far worse, going so far as to publish statements which imply or state that SAMANTHA is a racist.

48. The defamatory statements made in the Series, Episodes 2 – 5 are restated below. These statements are either defamatory on their own or when taken together create the implication that SAMANTHA is a liar and “agent provocateur,” the one who is fabricating stories, and a racist.

49. The statements:

- a. MEGHAN said: “I was with my mom during the week and with my dad on the weekends. And my dad lived alone, he had two adult children who had moved out of his house.” [Series. Season 1, Episode 2; 27:46]. In reality,

MEGHAN lived with her father full-time and visited her mother on some weekends. When MEGHAN was in Jr. High School, SAMANTHA lived on the property and was always home when MEGHAN came home from school. Often, she drove MEGHAN to school or accompanied her father when her father drove. After school SAMANTHA and Thomas Markle would help her with her homework, and he took MEGHAN shopping on weekends.

- b. Meghan said: “You’re telling people you raised me.” [Series. Season 1, Episode 3; 18:17]. MEGHAN said this, herself, and it is not true. SAMANTHA never suggested that she raised MEGHAN. These false statements are incendiary to MEGHAN’s fans who have harassed and threatened SAMANTHA due to these statements published by MEGHAN.
- c. MEGHAN said: “I don’t remember seeing her when I was a kid at my dad’s house, if and when they would come around.” [Series, Season 1, Episode 3; 18:31]. In reality, MEGHAN was close to SAMANTHA while she lived in her father’s home, and there is no way that she could have forgotten it, considering that she continues to have memories of other issues at that time.
- d. Christopher Bouzy who worked for Bot Sentinel and was retained by MEGHAN for the Series, and in his employ by MEGHAN, in the course of and scope of his retention, he said and MEGHAN published:
 - i. “So this is not your everyday trolling... It’s insane. And it was done by people who were just not the typical quote-unquote trolls. Thes

are housewives. These are middle-aged Caucasian women creating just constant attacks, from “Go back to America,” to basically, you know “Why don’t you die?”

- ii. “Samantha Markle was part of the group that was putting out a lot of this disinformation.”
 - iii. “How can the half-sister of Meghan be part of a hate group.”
 - iv. “Perhaps the most troubling part of this is the number of British journalists interacting with and amplifying the hate and the lies.”
 - v. “For the main hate accounts, their primary motive is monetizing this stuff.”
 - vi. “But the secondary accounts, it’s all about hatred.”
 - vii. “It’s about, you know... You know, race.”
 - viii. “So, then there would be derogatory terms where they would use the N-word on tweets.” [Series. Season 1, Episode 5; 29:19 – 31:49].
- e. Prince Harry said: “I think for people to really understand, you know when you plant a seed that is so hateful, what it can grow into.” [Series. Season 1, Episode 5; 32:00]
- f. To Prince Harry’s comments, alluding to the press and SAMANTHA, MEGHAN said: “You’re making people want to kill me – it’s not just a tabloid. It’s not just some story. You are making me scared.” [Series. Season 1, Episode 5; 32:05].

g. Christopher Bouzy added, and MEGHAN published: “Samantha had her account suspended;” “And then we actually sent Twitter a list because she had, like, eleven (11) additional accounts. And yeah, we were baffled by this.” [Series. Season 1, Episode 5; 30:20].

50. In truth, Samantha originally had only the one (1) original Twitter account and she was not part of the spreading of alleged misinformation. She was, however, the victim of hacking and individuals creating imposter accounts. As a result of the hacking and imposter accounts, she was forced to make her own other accounts when trolls of MEGHAN literally took over her one (1) original account.

51. The suspension of her account, which is impliedly due to statements about MEGHAN, in reality, was a short “freeze” because of SAMANTHA’s endorsement of Ivermectin. Others, unknown and unbeknownst to SAMANTHA had created other accounts in SAMANTHA’s name. She was not suspended because of the alleged misinformation that was spread about MEGHAN and attributed to SAMANTHA’s name and account.

52. The implication of the statements said in the Series produced and edited by MEGHAN through her own words and hand-picked interviewees were incredibly damaging and dangerous. In this regard, the Series falsely accused SAMANTHA to be a member of a hate group which was about “race,” and even used the “N-Word.” The statements demonize SAMANTHA. The Series is a porta vox for MEGHAN used to reach millions of people, many of whom used the Series to cause the formation of their negative

opinion of SAMANTHA and begin their own hate-filled smear campaigns which actually rose to the level of death threats against SAMANTHA.

53. MEGHAN and the Series intentionally and purposefully denied the truth: that a relationship existed between SAMANTHA and MEGHAN. Going so far as to deny the existence of a relationship between SAMANTHA and MEGHAN since they were younger, living in the same home, under their father's roof, or adjacent to it.

54. The Series undermined SAMANTHA. It both directly stated and implied that everything SAMANTHA was saying or had said was a lie, by a stranger attempting to take an unfair and dishonest effort to capitalize on MEGHAN's fame, and to do so by vaulting a false narrative to the public that SAMANTHA was MEGHAN's half sister, and that they were close prior to MEGHAN dating Prince Harry.

55. MEGHAN continues to participate in and perpetuate the lies around her family and upbringing, and where MEGHAN could have set the record straight, she did not. Instead, MEGHAN continues the hurtful lies being told about her sister, SAMANTHA; lies that have defamed SAMANTHA and the negative fallout that has therefrom occurred.

Harm Was Caused

56. MEGHAN's prevarications were greatly injurious to SAMANTHA because it caused a public reaction.

57. SAMANTHA lives in a small Florida city, Lakeland, where she is well known. Moreover, she is known because she is the sister of MEGHAN who enjoys great fame, wealth, and prestige. MEGHAN is a celebrity with a huge fan base, which includes

extremists. When MEGHAN repeated over and over the same false narrative of not knowing her sister and the two of them not being close, she instilled anger in her fan base against SAMANTHA, by a significant part of the population of Lakeland.

58. Suddenly, with MEGHAN's lies, emotionally connected fans turned against SAMANTHA believing that she was a imposter who was distant from her younger sister. SAMANTHA was made out to be a greedy and dishonest opportunist when people believed that she had no relationship with her sister, and that SAMANTHA was attempting to cash-in on her sister's success and fame.

59. All the false remarks in the Oprah Winfrey Interview and Netflix Series around SAMANTHA were false, whether said directly by MEGHAN or others at her obeiance. Stated with full knowledge that the statements she was saying were false. All the statements by MEGHAN were said with malice in that she knew that they were false, and she also knew that they would cause harm to her older sister, SAMANTHA.

60. Moreover, the publicization of the defamatory statements in this case was on a worldwide scale by a celebrity, MEGHAN. By virtue of SAMANTHA's relation to her half-sister, the public took an interest in SAMANTHA.

61. The false and malicious statements above caused substantial, irreparable prejudice, injury, and harm to SAMANTHA's reputation to a substantial, sizable, and appreciable part of SAMANTHA's community, and caused her great anxiety and emotional distress.

62. As a direct result of MEGHAN's false and defamatory statements and those

which were not hers, but which she published by her, SAMANTHA received hateful emails and messages on a regular basis and her reputation has been so damaged that she has been unable to work in her profession as a mental health counselor.

63. The dangerousness of the false narrative can be seen in the fact that SAMANTHA sought and obtained an “Injunction for Protection Against Stalking” in Polk County, Florida against one of MEGHAN’s overzealous fans.

64. All predicate acts which were required to have been done have been done or the requirement has been waived.

Count I -- Defamation

65. SAMANTHA avers the allegations in Paragraphs 1 through 64, above, and incorporates them by reference as though they are fully restated in this Count.

66. Utilizing her power as the Duchess of Sussex, MEGHAN made, published, and disseminated false statements about her own half-sister SAMANTHA, with the intent to spread the statements across the globe.

67. As a consequence, of the false and defamatory allegations and statements, SAMANTHA was subjected to an incomprehensible amount of public scrutiny.

68. On a regular basis, SAMANTHA receives hate messages and suffers emotionally from the worldwide hatred, contempt, and ridicule that she is forced to endure.

69. As described above, the statements made by MEGHAN were false, and at the time the statements were made MEGHAN had actual knowledge that these statements were false.

70. Disregarding the truth and veracity of her statements MEGHAN has

repeatedly and continuously published false and defamatory statements regarding SAMANTHA. To this day, MEGHAN continues to contact the media in order to further spread these blatant lies across the globe.

71. The false and defamatory statements have prejudiced, harmed, and injured SAMANTHA's reputation, and she is exposed to hatred, ridicule, and contempt by the public daily.

72. Moreover, because of the malicious statements, SAMANTHA has also suffered injury to her occupation as a Mental Health Counselor.

73. The statements made by MEGHAN was the direct and proximate cause of SAMANTHA's harm and taken together have caused SAMANTHA to suffer actual damage in the form of harm to occupation, as well as emotional and mental distress, including anxiety and fear due to threatening and violent emails and messages she receives on a regular basis from the public, and the permanent harm caused to her reputation and credibility.

WHEREFORE, the Plaintiff, SAMANTHA M. MARKLE, asks that his Court grant a judgment for compensatory damages, punitive damages, costs and such further and other relief as this Honorable Court may deem just and proper.

Count II -- Defamation by Implication

74. SAMANTHA avers the allegations in Paragraphs 1 through 64, above, and incorporates them by reference as though they are fully restated in this Count.

75. It is not just the words MEGHAN used, but also how she crafted her false narrative that causes damage to SAMANTHA. Not accomplished by direct statements

about SAMANTHA alone; but also, in MEGHAN’s juxtaposition of lie and fact and the surgically precise omission of truth, that, like the spider and the fly, weaves MEGHAN’s false narrative and injures SAMANTHA, encapsulating the unsuspected listener in the gossamer web of fiction, spun by MEGHAN.

76. MEGHAN went to great lengths to “silence” the truth by impugning and damaging the character of SAMANTHA, because SAMANTHA knew the truth of MEGHAN’s past.

77. One can look at any one of the above statements from either of the Interview and the Series and see how those statements damage and defame SAMANTHA’s character by the juxtaposition of MEGHAN’s lies with facts to imply SAMANTHA is a liar, untruthful fame-seeker, racist and only out to hurt MEGHAN to make an unearned and unworthy name for herself.

78. MEGHAN intentionally and knowingly omitted facts.

79. MEGHAN’s false statements created the defamatory implication that SAMANTHA had no relationship whatsoever with her sister and that SAMANTHA was creating a lucrative career selling false stories to the tabloids and television programs.

80. MEGHAN engaged in such defamatory by implication conduct knowingly, intentionally and with actual malice, fully aware that she was doing such with the plan to damage, injure and harm SAMANTHA’s reputation and credibility.

81. The defamatory by implication statements in fact severely damaged SAMANTHA by prejudicing, harming, and injuring her reputation and credibility, and exposing her to hatred, ridicule or contempt in her business, reputation and occupation.

82. SAMANTHA has suffered actual damages in the form of lost employment, lost income from sales of her autobiography, emotional and mental distress, including anxiety and fear due to the threatening and violent emails and messages she receives regularly, and harm to her reputation and credibility.

WHEREFORE, SAMANTHA M. MARKLE asks this Court to enter a judgment for compensatory damages, punitive damages, costs and for such further and other relief that this Honorable Court may deem just and proper.

Demand for Trial By Jury

The Plaintiff, SAMANTHA M. MARKLE hereby demands a trial by jury on all issues so triable.

DESIGNATION OF EMAIL ADDRESSES FOR SERVICE

(Pursuant to Rule 2.516 Fla. R. Jud. Admin.)

The undersigned attorneys of The Ticktin Law Group hereby designate the following Email Addresses for service in the above styled matter. Service shall be complete upon emailing to the following email addresses in this Designation, provided that the provisions of Rule 2.516 are followed.

Serv549@LegalBrains.com; Serv513@LegalBrains.com;
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**SERVICE IS TO BE MADE TO EACH AND EVERY EMAIL ADDRESS
LISTED IN THIS DESIGNATION AND TO NO OTHERS.**

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished to all parties registered to receive service via CM/ECF this **13th day of April, 2023**, to **MICHAEL J. KUMP, ESQUIRE**, mkump@kwikhlaw.com, Kinsella Weitzman Iser Kump Holley LLP, Attorneys for MEGHAN, 808 Wilshire Boulevard, 3rd Floor, Santa Monica, CA 90401, and **DOUGLAS A. KAHLE**, dkahle@schwedspa.com, Schwed Kahle & Kress P.A., 11410 North Jog Road, Suite 100, Palm Beach Gardens, FL 33418.

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